

1 April 2003

Mr. Otu Ekpo-Otu
Voluntary Cleanup Section
Remediation Division
Texas Commission on Environmental Quality
P.O. Box 13087, Mail Code 221
Austin, Texas 78711-3087

RECEIVED

APR 02 2003

VOLUNTARY CLEANUP SECTION

Re: Commercial Metals Company - Corpus Christi
Voluntary Cleanup Program (VCP) Number 222

Dear Mr. Ekpo-Otu:

Cook-Joyce, Inc. (CJI) has prepared this letter to summarize the status of the proposed off-site sampling event at the Commercial Metals Company (CMC) facility located in Corpus Christi, Texas. As we discussed, the previous property access agreement executed with the City of Corpus Christi (City) has expired. CJI and CMC requested that the City execute a new agreement and are currently awaiting final execution of that agreement by the City. The proposed agreement with the City has been signed by CMC and returned for signature by the City's Attorney and Director of Engineering Services. According to Mr. John O'Hair with the City's Property & Land Acquisition Division, the agreement will be executed within the next few weeks, depending upon the availability of the above-referenced City personnel. Access agreements have been executed with all of the other adjacent landowners on whose property sampling is proposed.

Once authorization to access the City's properties has been received, CJI will notify you, the Texas Commission on Environmental Quality's Region 14 office in Corpus Christi, and the adjacent landowners of a specific date upon which the sampling activities will be conducted. In the meantime, should you have any questions regarding this project, please give me a call at 474-9097.

Sincerely,

Polly Johnson

PJ:nn

cc: Kelly Nash, CMC



August 14, 2012

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Brad Bredesen
Environmental Manager Central/West
Commercial Metals Company
1 Steel Mill Dr.
Seguin, TX 78155

RE: United States Environmental Protection Agency (EPA) Region 6 Risk-based Polychlorinated Biphenyl (PCB) Remediation Approval Pursuant to 40 CFR § 761.61(c) for the Commercial Metals Facility Located at Corpus Christi, Texas, EPA ID No. TXD070482757.

Dear Mr Bredesen:

We hereby approve your PCB risk-based cleanup and decontamination plan subject to the enclosed Conditions of Approval. Your application (dated July 20, 2011 and modified April 11, 2012) requested approval of a PCB risk-based cleanup and decontamination plan pursuant to 40 CFR § 761.61(c) for the 17.2 acre CMC recycling facility located at 4614 Agnes Street, Corpus Christi, Texas. A Public Notice announcing our proposal to approve your application was published in the Corpus Christi Caller-Times on June 20, 2012, which opened a 45-day comment period. No comments were received during the comment period which closed on August 4, 2012.

Based on the following information and review of the proposed clean-up plan, we have determined that the clean-up and decontamination of the PCB contaminated soils and concrete in accordance with the plan referenced above and the enclosed Conditions of Approval will not pose an unreasonable risk to human health or the environment during future planned use of the facility. Factors that led to EPA's finding of no unreasonable risk and approval of this application are discussed below:

1. Facility History, Description, and Extent of PCB Contamination: The CMC facility is a 17.2 acre property located at 4614 Agnes Street, Corpus Christi, Texas. Prior to CMC's purchase of the site in 1976, General Export Iron and Metal Company operated a secondary metals processing facility since 1951. CMC operations included purchase and transport of both ferrous and non-ferrous metals for recycling. Metals purchased for recycling are sorted into various storage containers and stockpiles on the northern portion of the site before being shipped off-site for further processing. CMC previously operated a shredder at this facility that has been removed. Offices and warehouses are located on the southern portion of the site which is surfaced with concrete.

The terrain at CMC is generally flat with ground elevations between 39 to 43 feet above sea level. The property is not located within the 100-year floodplain. Average annual rainfall for the Corpus Christi area is 32 inches per year with most rainfall between April and October. According to reports, the property consists of a layer of fill material underlain by clay. Boring logs show the upper 8 to 16 feet generally consists of clay and silty clay. The clay ranges in depth from 0 to 33 feet below ground surface. Beneath the clay is a moist to saturated sandy silt which makes up the shallow water-bearing area. Below this sand is another clay unit. The approximate depth to groundwater ranges from 10 to 15 feet below ground surface with a gradient generally toward the east-northeast beneath most of the southern portion of the property and shifts toward the east beneath the northern portion of the property.

Land use surrounding the CMC property is primarily commercial/industrial. The nearest residential area is located 0.5 miles to the east-northeast. The nearest surface water bodies are Tule Lake Channel and Industrial Canal located two miles north of the property. A small drainage swale is located along the eastern property boundary. No wildlife or livestock are present, and the property does not provide habitat, foraging, or refuge for ecological communities.

The Texas Natural Resource Conservation Commission (TNRCC) conducted soil sampling at CMC in July 1987, which indicated elevated levels of PCBs and lead. In November 1996, the TNRCC finalized a Voluntary Cleanup Program (VCP) agreement with CMC which included soil sampling and the installation of ground water monitoring wells. Off-site sampling was conducted in January 2004 which indicated elevated risk levels of numerous metals including arsenic, and PCBs. In 2008 additional monitoring wells were installed off-site.

A revised sampling plan was approved by the TCEQ on June 18, 2009. EPA Region 6 reviewed the results of this plan and on a conference call held on September 20, 2010, requested a more detailed justification for soil sampling intervals used to assess the lateral and vertical extent of the PCB contaminated soils. A geostatistical evaluation was prepared to justify the sampling grids, dated December 21, 2010, and was submitted to EPA for review. This plan was reviewed and approved on April 13, 2011.

On-site soil and concrete samples, off-site soil samples, and groundwater samples were collected and analyzed to adequately characterize the extent of PCB contamination at the facility at levels 0 to 10 feet below ground surface. On-site assessment areas are designated as North, Central, Hot Spot, and South. The highest reported on-site PCB concentration was 2,670 mg/kg collected in a soil sample near the center of the property by the weighing station. PCBs usually ranged from the 1-40 mg/kg level. Concrete exists in the North, Hot Spot, and Central assessment areas. In the North area, the highest concrete sample was 13.99 mg/kg. PCB concrete samples in the Hot Spot areas did not

exceed 1 mg/kg. The highest PCB concrete sample in the Central area was 1.148 mg/kg. The highest off-site concentration was 18 mg/kg on the City of Corpus Christi property.

Several other adjoining properties were found to be contaminated with PCBs over 1 ppm. PCBs were not found deeper than 8 feet below ground surface.

No PCBs were detected in groundwater monitoring wells at the facility. Potable water supplies in this area are received from the City of Corpus Christi. Their primary water supply is the Choke Canyon/Lake Corpus Christi Reservoir System. No water supply wells have been identified within a 0.5 mile radius of the CMC facility either by visual or records search.

2. The PCB Clean-up Plan: The primary exposure pathways identified from the assessment include soil direct contact, soil-to-groundwater ingestion, and groundwater ingestion. The clean-up plan under this risk-based approval has been designed to eliminate these exposure pathways.

a. Plume Management Zone: A Plume Management Zone (PMZ) is required under the TCEQ's VCP program for control of Chemicals of Concern (COC) concentrations exceeding TCEQ permit control limits, and to ensure no PCBs are entering into the groundwater after clean-up activities have been completed. No water wells will be permitted to be installed onsite.

b. Off-site Soils: Off-site soils with PCB concentrations greater than 1 mg/kg and less than 50 mg/kg will be disposed at a landfill permitted by the TCEQ to manage non-municipal, non-hazardous waste, or disposed in the onsite cap. Off-site soils with a PCB concentration of 50 mg/kg to less than 500 mg/kg will be placed under the onsite cap or disposed at a permitted TCEQ Resource Conservation and Recovery Act (RCRA) landfill or an approved TSCA PCB landfill. Off-site soils with equal to or greater than 500 mg/kg PCBs will be disposed at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. Confirmation sampling will use a 10 foot grid as proposed in Attachment A of the April 11, 2012, modified cleanup plan. Excavated soils will be stockpiled on plastic and covered at designated soil staging areas.

c. On-site Soils: On-site soils with PCB concentrations equal to or greater than 500 mg/kg will be removed and disposed at a permitted TCEQ RCRA landfill or an approved TSCA PCB landfill. Soils with PCB concentrations greater than 1 mg/kg and less than 500 mg/kg will be capped in place, or moved to the fenced-in capped area. Confirmation sampling will use a 10 foot grid as proposed in Attachment A of the April 11, 2012, modified cleanup plan.

The cap will comply with design and construction requirements under 40 CFR § 761.61(a)(7) (Cap requirements.) with at least two feet of compacted clay layered with six inches of clean soil for vegetative cover. The capped area will be approximately 1450 feet long, and cover an estimated 6,000 cubic yards of PCB contaminated soil containing less than 500 mg/kg PCBs.

d. On-Site Concrete: On-site contaminated concrete greater than 1 mg/kg and less than 50 mg/kg will be disposed under the clay cap, or at a landfill permitted to receive PCBs less than 50 mg/kg. Concrete with concentrations between 50 mg/kg and 500 mg/kg will be placed under the clay cap or at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. No PCBs have been detected in the concrete greater than 500 mg/kg. However, if any is detected it will be remediated to below 50 mg/kg by mechanical removal including scrapping, scarifying, shot blasting, and chipping to remove at least 1/8 inch of the surface of the concrete. Concrete dust generated during remediation will be disposed at a TSCA approved chemical waste landfill. The concrete removed will be disposed in either a landfill permitted to receive such wastes, or under the on-site clay cap. Verification sampling shall comply with 40 CFR § 761 Subpart O with a 10 foot grid as proposed in Attachment A of the April 11, 2012, modified cleanup plan.

e. Storm Water Management: The site will be re-graded and backfilled with clean soil to facilitate the flow of storm water to a storm water management system. A retention structure will be constructed on the northwest corner of the facility which will be the active portion of the facility where receipt and transport of scrap metal material will continue post-cleanup.

The storm water management system that includes a storm water retention basin will capture runoff from a 5-year, 24-hour storm event from the active portion of the facility. Storm water runoff shall be analyzed for PCBs before release. Overflow weirs will be constructed and allow for runoff in excess of the 5-year storm volume to prevent on-site flooding, and allow discharge off-site to an existing drainage channel

3. Post-Closure Care and Future Land Use: The site will be deed recorded in accordance with TCEQ and EPA TSCA PCB regulations. An Inspection Checklist for quarterly cap inspection will be used as part of the post-closure care requirements to ensure the remedial measures remain effective in preventing further PCB contamination. Post closure Operation and Maintenance activities will include such check listed items as cap inspection, fencing and security, sediment and erosion control, storm water management system inspection, and groundwater and surface water monitoring. An annual report will be submitted to TCEQ as required by the Texas Voluntary Cleanup

Program, Texas Health and Safety Code, Chapter 361, Sub Chapter S, with a copy to EPA to document post-closure activities including PCB sampling results.

Future use of the site includes continuation of secondary scrap metal recycling on the non-capped southern portion of the site (consisting of approximately 6.3 acres). The site will be limited to commercial/industrial land use with low occupancy restrictions. Typically, public and commercial vendors would bring ferrous and non-ferrous metals to the site in vehicles. After sorting, ferrous streams would be shipped off-site for further processing, and non-ferrous streams will be packaged for sale on the open market. No shredding operations shall be permitted on the capped area under this approval.

CMC shall abide by the conditions of this approval which becomes effective on the date of this letter. If you have questions or comments, please contact Mr. James Sales of my staff at (214) 665-6796.

Sincerely yours,

Carl E. Edlund, P.E.
Director
Multimedia Planning and
Permitting Division

Enclosure

cc: Mr. Earl Lott, Texas Commission on Environmental Quality

**PCB RISK-BASED CLEAN-UP
PCB CONDITIONS OF APPROVAL
(40 CFR § 761.61(c))**

**FOR
Commercial Metals Company Recycling Facility
Corpus Christi, Texas**

The terms and abbreviations in these conditions are in accordance with those defined in 40 CFR § 761.3 unless otherwise noted. The term "Facility" hereinafter refers to the Commercial Metals Company's Recycling Facility, located at 4614 Agnes Street, Corpus Christi, Texas.

I. LOCATION OF FACILITY

The Facility is located at 4614 Agnes Street, Corpus Christi, Texas

II. PCB CLEAN-UP AND DECONTAMINATION CONDITIONS

A. Clean-up Requirements

1. The Facility shall implement the plan submitted to EPA Region 6 dated July 2011, and modified on April 11, 2012.
2. Off-site soils with PCB concentrations greater than 1 mg/kg and less than 50 mg/kg shall be disposed at a landfill permitted by the TCEQ to manage non-municipal, non-hazardous waste or under the cap. Off-site soils with 50 mg/kg PCBs or greater shall be disposed at a TCEQ RCRA permitted landfill, an EPA approved TSCA PCB landfill or under the cap. Off-site soils with equal to or greater than 500 mg/kg PCBs shall be disposed at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. Confirmation sampling shall comply with 40 CFR Subpart O with a 10 foot grid spacing as proposed in the modified plan of April 11, 2012. Sampling and analysis shall comply with EPA approved methods and procedures.
3. On-site soils with PCB concentrations greater than 500 mg/kg shall be removed and disposed at a TCEQ permitted RCRA landfill or an approved TSCA PCB landfill. Soils with PCB concentrations greater than 1 mg/kg and less than 500 mg/kg shall be capped in place, or moved to the fenced-in capped area. Confirmation sampling shall comply with 40 CFR Subpart O with a 10 foot grid spacing as proposed in the modified plan of April 11, 2012. Sampling and analysis shall comply with EPA approved methods and procedures.

4. The cap shall comply with design and construction requirements under 40 CFR § 761.61(a)(7) (Cap requirements.) with at least two feet of compacted clay layered with six inches of clean soil for vegetative cover. Excavated soils shall be stockpiled on plastic and covered at designated soil staging areas to prevent wind dispersion.

5. On-site contaminated concrete greater than 1 mg/kg and less than 50 mg/kg shall be disposed under the clay cap, or at a landfill permitted to receive PCBs less than 50 mg/kg. Concrete with concentrations between 50 mg/kg and 500 mg/kg shall be placed under the clay cap or at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. Concrete determined to be contaminated with 500 mg/kg PCBs or greater shall be remediated to below 50 mg/kg by mechanical removal including scrapping, scarifying, shot blasting, and chipping to remove at least 1/8 inch of the surface of the concrete. Concrete dust generated during remediation shall be disposed at a TSCA approved chemical waste landfill. The concrete removed shall be disposed in either a landfill permitted to receive such wastes, or under the on-site clay cap. Verification sampling shall comply with 40 CFR 761 Subpart O. Sampling and analysis shall comply with EPA approved methods and procedures.

6. The site shall be regraded and backfilled with clean soil to facilitate the flow of storm water to a storm water management system. A retention structure shall be constructed at the northwest corner of the facility to prevent contamination of the facility from the active portion of the facility where receipt and transport of scrap metal material will continue post-cleanup.

7. The storm water management system that includes a storm water retention basin shall capture runoff from a 5-year, 24-hour storm event from the active portion of the facility. Overflow weirs shall be constructed to allow for runoff in excess of the 5-year storm volume to prevent on-site flooding.

8. All bulk PCB remediation waste containing less than 50 mg/kg PCBs disposed at a landfill permitted by the TCEQ to manage non-municipal, non-hazardous waste shall comply with the notification requirements pursuant to 40 CFR § 761.61(a)(5)(i)(B)(2)(iv).

9. All bulk PCB remediation waste containing 50 mg/kg PCBs or greater disposed at a TCEQ permitted RCRA landfill shall comply with the notification requirements pursuant to 40 CFR § 761.61(a)(5)(i)(B)(2)(iv) and shall be manifested.

B. Post-Clean-up Requirements

1 The site shall be deed recorded in accordance with TCEQ and EPA TSCA PCB regulations.

2. An Inspection Checklist for quarterly cap inspection shall be conducted as part of the post-closure care requirements to ensure the remedial measures remain effective in preventing further PCB contamination. Any required repairs shall be completed within 5 working days of discovery.

3. Post closure Operation and Maintenance activities shall comply with Appendix F in the plan of July 2011. The checklist shall include such items as cap inspection, fencing and security, sediment and erosion control, storm water management system inspection, and groundwater and surface water monitoring. An annual report shall be submitted to TCEQ and EPA to document post-closure activities.

4. Groundwater and surface water samples shall be collected in accordance with EPA approved methods and procedures every six months for three years beginning six months after clean-up has been completed and a final report has been submitted and approved by EPA Region 6. Groundwater samples shall be collected from groundwater monitoring wells MW-2, WMW-6, WMW-7 and WMW-11. At the end of three years, EPA Region 6 will review the monitoring results and re-assess the post-closure monitoring requirements. If PCBs are detected in the ground water or surface water samples, the Facility shall take immediate action to determine the source or sources of contamination and implement any required remedial action approved by EPA or the TCEQ.

5. Storm water runoff shall be analyzed for PCBs before release from the retention basin using approved EPA sampling and analysis methods appropriate for the samples collected. Sediment shall be removed from the basin as needed. Removed sediment shall be sampled and analyzed for PCBs to determine appropriate disposal options. At least one water sample shall be collected and analyzed for PCBs during storm events where water is released over the weir.

C. Final Report

After the clean-up and decontamination project is completed, the Facility shall submit a final report to EPA Region 6 detailing the final actions taken to remediate the PCB-contaminated concrete surfaces. The report shall contain copies of PCB verification analysis of the contaminated surfaces and a color

coded map indicating the final PCB concentrations at the contaminated grid points. The report shall be submitted within 90 days of completion of the project.

III. STANDARD APPROVAL CONDITIONS

A. Severability

The conditions of this authorization are severable, and if any provision of this authorization, or any application of any provision, is held invalid, the remainder of this authorization shall not be affected thereby.

B. Duty to Comply

The Facility shall comply with all Federal, State, and local regulations, approvals, and permits.

C. Personnel Safety

Facility personnel safety requirements and procedures for PCB handling, storage, transport, and disposal shall comply with OSHA requirements.

D. Duty to Mitigate

The Facility shall correct any adverse impact on the environment resulting from noncompliance with this approval.

E. Duty to Provide Information

The Facility shall provide any relevant information which EPA may request to determine whether cause exists for modifying, revoking, reissuing, or terminating this approval, or to determine compliance with this approval. The Facility shall also provide, upon request, copies of records required to be kept pursuant to the TSCA PCB regulations.

F. Inspection and Entry

The Facility shall allow an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

1. enter the Facility during normal business hours,

2. have access to and copy any records that shall be kept under the TSCA PCB regulations,
3. inspect any equipment, practices, or operations required under this approval or the TSCA PCB regulations, or
4. sample or monitor for the purpose of assuring that the Facility is in compliance with the conditions of this approval or the TSCA PCB regulations.

G. Monitoring and Records

The Facility shall comply with all monitoring and record keeping requirements for PCB closure sites in accordance with 40 CFR § 761.125(c)(5) (please refer to 40 CFR § 761.61(a)(3), (a)(4), and (a)(5) for records information).

H. Effective Date

This approval becomes effective on the date of the approval letter. Clean-up and decontamination required under conditions of this approval shall be completed within 12 months of commencement of PCB remediation activities. The Facility may request an extension of the completion date from the EPA Region 6 if more time is required to complete the project. The Facility shall notify the EPA Region 6 in writing thirty (30) days before commencing remediation activities.

END OF APPROVAL CONDITIONS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

MAY 09 2012

Brad Bredesen
Environmental Manager Central/West
Commercial Metals Company
1 Steel Mill Dr.
Seguin, TX 78155

RE: United States Environmental Protection Agency (EPA) Region 6 Risk-based Polychlorinated Biphenyl (PCB) Remediation Proposed Approval Pursuant to 40 CFR 761.61(c) for the Commercial Metals Company (CMC) Recycling Facility located in Corpus, Corpus Christi, Texas; EPA ID TXD070482757

Dear Mr Bredesen:

Enclosed is our proposal to approve your request for a PCB risk-based remediation at your facility located at 4614 Agnes Street, Corpus Christi, Texas pursuant to 40 CFR 761.61(c). A Public Notice announcing this proposal will be placed in the Corpus Christi Caller-Times which will open a 45-day comment period during which requests may be made for a Public Hearing.

After the comment period closes, we will evaluate any significant or substantial comments received and determine whether a Public Hearing should be convened. If a Hearing is to be convened, a 30-day advance notice will be published announcing the Hearing date, time, and place in the Corpus Christi, Texas area. If no Hearing is convened, a final determination will be made on the proposal.

If you have questions or concerns, please contact Mr. James Sales of my staff at (214) 665-6796.

Sincerely,

A handwritten signature in black ink, appearing to read "SS", is written over the typed name "Susan Spalding".

Susan Spalding
Associate Director for RCRA
Multimedia Planning and
Permitting Division

Enclosure (Proposal with PCB Approval Conditions)

cc: Earl Lott, TCEQ



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS TX 75202-2733

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Brad Bredesen
Environmental Manager Central/West
Commercial Metals Company
1 Steel Mill Dr.
Seguin, TX 78155

RE: United States Environmental Protection Agency (EPA) Region 6 Risk-Based Polychlorinated Biphenyl (PCB) Remediation Approval Pursuant to 40 CFR 761.61(c) for the Commercial Metals Company (CMC) Recycling Facility located in Corpus Christi, Texas; EPA ID TXD070482757

Dear Mr. Bredesen:

We hereby approve your PCB risk-based cleanup and decontamination plan subject to the enclosed Conditions of Approval. Your application (dated July, 20, 2011, and modified April 11, 2012) requested approval of a PCB risk-based cleanup and decontamination plan pursuant to 40 CFR 761.16(c) for the 17.2 acre CMC recycling facility located at 4614 Agnes Street, Corpus Christi, Texas.

Based on the following information and review of the proposed cleanup plan, we have determined that the cleanup and decontamination of the PCB contaminated soils and concrete in accordance with the plan referenced above and the enclosed Conditions of Approval will not pose an unreasonable risk to human health or the environment during future planned use of the facility. Factors that led to our finding of no unreasonable risk and approval of this application are discussed below:

1. Facility History, Description, and Extent of PCB Contamination: The CMC facility is a 17.2 acre property located at 4614 Agnes Street, Corpus Christi, Texas. Prior to CMC's purchase of the site in 1976, General Export Iron and Metal Company operated a secondary metals processing facility since 1951. CMC operations included purchase and transport of both ferrous and non-ferrous metals for recycling. Metals purchased for recycling are sorted into various storage containers and stockpiles on the northern portion of the site before being shipped off-site for further processing. CMC previously operated a shredder at this facility that has been removed. Offices and warehouses are located on the southern portion of the site which is surfaced with concrete.

The terrain at CMC is generally flat with ground elevations between 39 to 43 feet above sea level. The property is not located within the 100-year floodplain. Average annual rainfall for the Corpus Christi area is 32 inches per year with most rainfall between April and October. According to reports, the property consists of a layer of fill material underlain by clay. Boring logs show the upper 8

to 16 feet generally consists of clay and silty clay. The clay ranges in depth from 0 to 33 feet below ground surface. Beneath the clay is a moist to saturated sandy

silt which makes up the shallow water-bearing area. Below this sand is another clay unit. The approximate depth to groundwater ranges from 10 to 15 feet below ground surface with a gradient generally toward the east-northeast beneath most of the southern portion of the property and shifts toward the east beneath the northern portion of the property.

Land use surrounding the CMC property is primarily commercial/industrial. The nearest residential area is located 0.5 miles to the east-northeast. The nearest surface water bodies are Tule Lake Channel and Industrial Canal located two miles north of the property. A small drainage swale is located along the eastern property boundary. No wildlife or livestock are present, and the property does not provide habitat, foraging, or refuge for ecological communities.

The Texas Natural Resource Conservation Commission (TNRCC) conducted soil sampling at CMC in July 1987, which indicated elevated levels of PCBs and lead. In November 1996, the TNRCC finalized a Voluntary Cleanup Program (VCP) agreement with CMC which included soil sampling and the installation of ground water monitoring wells. Off-site sampling was conducted in January 2004 which indicated elevated risk levels of numerous metals including arsenic, and PCBs. In 2008 additional monitoring wells were installed off-site.

A revised sampling plan was approved by the TCEQ on June 18, 2009. EPA Region 6 reviewed the results of this plan and on a conference call held on September 20, 2010, requested a more detailed justification for soil sampling intervals used to assess the lateral and vertical extent of the PCB contaminated soils. A geostatistical evaluation was prepared to justify the sampling grids, dated December 21, 2010, and was submitted to EPA for review. This plan was reviewed and approved on April 13, 2011.

On-site soil and concrete samples, off-site soil samples, and groundwater samples were collected and analyzed to adequately characterize the extent of PCB contamination at the facility at levels 0 to 10 feet below ground surface. On-site assessment areas are designated as North, Central, Hot Spot, and South. The highest reported on-site PCB concentration was 2,670 mg/kg collected in a soil sample near the center of the property by the weighing station. PCBs usually ranged from the 1-40 mg/kg level. Concrete exists in the North, Hot Spot, and Central assessment areas. In the North area, the highest concrete sample was 13.99 mg/kg. PCB concrete samples in the Hot Spot areas did not exceed 1 mg/kg. The highest PCB concrete sample in the Central area was 1.148 mg/kg. The highest off-site concentration was 18 mg/kg on the City of Corpus Christi property.

Several other adjoining properties were found to be contaminated with PCBs over 1 ppm. PCBs were not found deeper than 8 feet below ground surface.

No PCBs were detected in groundwater monitoring wells at the facility. Potable water supplies in this area are received from the City of Corpus Christi. Their primary water supply is the Choke Canyon/Lake Corpus Christi Reservoir System. No water supply wells have been identified within a 0.5 mile radius of the CMC facility either by visual or records search.

2. The PCB Clean-up Plan: The primary exposure pathways identified from the assessment include soil direct contact, soil-to-groundwater ingestion, and groundwater ingestion. The clean-up plan under this risk-based approval has been designed to eliminate these exposure pathways.

a. Plume Management Zone: A Plume Management Zone (PMZ) is required under the TCEQ's VCP program for control of Chemicals of Concern (COC) concentrations exceeding TCEQ permit control limits, and to ensure no PCBs are entering into the groundwater after clean-up activities have been completed. No water wells will be permitted to be installed onsite.

b. Off-site Soils: Off-site soils with PCB concentrations greater than 1 mg/kg and less than 50 mg/kg will be disposed at a landfill permitted by the TCEQ to manage non-municipal, non-hazardous waste, or disposed in the onsite cap. Off-site soils with a PCB concentration of 50 mg/kg to less than 500 mg/kg will be placed under the onsite cap or disposed at a permitted TCEQ Resource Conservation and Recovery Act (RCRA) landfill or an approved TSCA PCB landfill. Off-site soils with equal to or greater than 500 mg/kg PCBs will be disposed at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. Confirmation sampling will use a 10 foot grid as proposed in Attachment A of the April 11, 2012, modified cleanup plan. Excavated soils will be stockpiled on plastic and covered at designated soil staging areas.

c. On-site Soils: On-site soils with PCB concentrations equal to or greater than 500 mg/kg will be removed and disposed at a permitted TCEQ RCRA landfill or an approved TSCA PCB landfill. Soils with PCB concentrations greater than 1 mg/kg and less than 500 mg/kg will be capped in place, or moved to the fenced-in capped area. Confirmation sampling will use a 10 foot grid as proposed in Attachment A of the April 11, 2012, modified cleanup plan.

The cap will comply with design and construction requirements under 40 CFR 761.61(a)(7) (Cap requirements.) with at least two feet of compacted clay layered with six inches of clean soil for vegetative cover. The capped area will be approximately 1450 feet long, and cover an estimated 6,000 cubic yards of PCB contaminated soil containing less than 500 mg/kg PCBs.

d. On-Site Concrete: On-site contaminated concrete greater than 1 mg/kg and less than 50 mg/kg will be disposed under the clay cap, or at a landfill permitted to receive PCBs less than 50 mg/kg. Concrete with concentrations between 50

mg/kg and 500 mg/kg will be placed under the clay cap or at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. No PCBs have been detected in the concrete greater than 500 mg/kg. However, if any is detected it will be remediated to below 50 mg/kg by mechanical removal including scrapping, scarifying, shot blasting, and chipping to remove at least 1/8 inch of the surface of the concrete. Concrete dust generated during remediation will be disposed at a TSCA approved chemical waste landfill. The concrete removed will be disposed in either a landfill permitted to receive such wastes, or under the on-site clay cap. Verification sampling shall comply with 40 CFR 761 Subpart O with a 10 foot grid as proposed in Attachment A of the April 11, 2012, modified cleanup plan.

e. Storm Water Management: The site will be re-graded and backfilled with clean soil to facilitate the flow of storm water to a storm water management system. A retention structure will be constructed on the northwest corner of the facility which will be the active portion of the facility where receipt and transport of scrap metal material will continue post-cleanup.

The storm water management system that includes a storm water retention basin will capture runoff from a 5-year, 24-hour storm event from the active portion of the facility. Storm water runoff shall be analyzed for PCBs before release. Overflow weirs will be constructed and allow for runoff in excess of the 5-year storm volume to prevent on-site flooding, and allow discharge off-site to an existing drainage channel

3. Post-Closure Care and Future Land Use: The site will be deed recorded in accordance with TCEQ and EPA TSCA PCB regulations. An Inspection Checklist for quarterly cap inspection will be used as part of the post-closure care requirements to ensure the remedial measures remain effective in preventing further PCB contamination. Post closure Operation and Maintenance activities will include such check listed items as cap inspection, fencing and security, sediment and erosion control, storm water management system inspection, and groundwater and surface water monitoring. An annual report will be submitted to TCEQ as required by the Texas Voluntary Cleanup Program, Texas Health and Safety Code, Chapter 361, Sub Chapter S, with a copy to EPA to document post-closure activities including PCB sampling results.

Future use of the site includes continuation of secondary scrap metal recycling on the non-capped southern portion of the site (consisting of approximately 6.3 acres). The site will be limited to commercial/industrial land use with low occupancy restrictions. Typically, public and commercial vendors would bring ferrous and non-ferrous metals to the site in vehicles. After sorting, ferrous streams would be shipped off-site for further processing, and non-ferrous streams will be packaged for sale on the open market. No shredding operations shall be permitted on the capped area under this approval.

CMC shall abide by the conditions of this approval which becomes effective on the date of this letter. If you have questions or concerns, please contact Mr. James Sales of my staff at (214) 665-6796.

Sincerely yours,

Carl E. Edlund, P.E.
Director
Multimedia Planning and
Permitting Division

Enclosure (PCB Approval Conditions)

cc: Earl Lott, TCEQ

**CONDITIONS OF APPROVAL
for
PCB RISK-BASED CLEANUP
(40 CFR 761.61(c))
at**

**Commercial Metals Company (CMC) Recycling Facility
Corpus Christi, Texas**

The terms and abbreviations in these conditions are in accordance with those defined in 40 CFR 761.3 unless otherwise noted. The term "Facility" hereinafter refers to the Commercial Metals Company's Recycling Facility, located at 4614 Agnes Street, Corpus Christi, Texas.

I. LOCATION

The Facility is located at 4614 Agnes Street, Corpus Christi, Texas.

II. PCB CLEAN-UP AND DECONTAMINATION CONDITIONS

A. Clean-up Requirements

1. The Facility shall implement the plan submitted to EPA Region 6 dated July 2011, modified on April 11, 2012.
2. Off-site soils with PCB concentrations greater than 1 mg/kg and less than 50 mg/kg shall be disposed at a landfill permitted by the TCEQ to manage non-municipal, non-hazardous waste. Off-site soils with 50 mg/kg PCBs or greater shall be disposed at a TCEQ RCRA permitted landfill, an EPA approved TSCA PCB landfill or under the cap. Off-site soils with equal to or greater than 500 mg/kg PCBs shall be disposed at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. Confirmation sampling shall comply with 40 C.F.R. Subpart O with a 10 foot grid spacing as proposed in the modified plan of April 11, 2012. Sampling and analysis shall comply with EPA approved methods and procedures.
3. On-site soils with PCB concentrations greater than 500 mg/kg shall be removed and disposed at a TCEQ permitted RCRA landfill or an approved TSCA PCB landfill. Soils with PCB concentrations greater than 1 mg/kg and less than 500 mg/kg shall be capped in place, or moved to the fenced-in capped area. Confirmation sampling shall comply with 40 CFR Subpart O with a 10 foot grid spacing as proposed in the modified plan of April 11, 2012. Sampling and analysis shall comply with EPA approved methods and procedures.
4. The cap shall comply with design and construction requirements under 40 CFR 761.61(a)(7) (Cap requirements.) with at least two feet of compacted clay layered with six inches of clean soil for vegetative cover. Excavated soils shall be stockpiled on plastic and covered at designated soil staging areas to prevent wind dispersion.

5. On-site contaminated concrete greater than 1 mg/kg and less than 50 mg/kg shall be disposed under the clay cap, or at a landfill permitted to receive PCBs less than 50 mg/kg. Concrete with concentrations between 50 mg/kg and 500 mg/kg shall be placed under the clay cap or at a TCEQ permitted RCRA landfill or an EPA approved TSCA PCB landfill. Concrete determined to be contaminated with 500 mg/kg PCBs or greater shall be remediated to below 50 mg/kg by mechanical removal including scrapping, scarifying, shot blasting, and chipping to remove at least 1/8 inch of the surface of the concrete. Concrete dust generated during remediation shall be disposed at a TSCA approved chemical waste landfill. The concrete removed shall be disposed in either a landfill permitted to receive such wastes, or under the on-site clay cap. Verification sampling shall comply with 40 C.F.R. 761 Subpart O. Sampling and analysis shall comply with EPA approved methods and procedures.

6. The site shall be regraded and backfilled with clean soil to facilitate the flow of storm water to a storm water management system. A retention structure shall be constructed at the northwest corner of the facility to prevent contamination of the facility from the active portion of the facility where receipt and transport of scrap metal material will continue post-cleanup.

7. The storm water management system that includes a storm water retention basin shall capture runoff from a 5-year, 24-hour storm event from the active portion of the facility. Overflow weirs shall be constructed to allow for runoff in excess of the 5-year storm volume to prevent on-site flooding.

8. All bulk PCB remediation waste containing less than 50 mg/kg PCBs disposed at a landfill permitted by the TCEQ to manage non-municipal, non-hazardous waste shall comply with the notification requirements pursuant to 40 CFR 761.61(a)(5)(i)(B)(2)(iv).

9. All bulk PCB remediation waste containing 50 mg/kg PCBs or greater disposed at a TCEQ permitted RCRA landfill shall comply with the notification requirements pursuant to 40 CFR 761.61(a)(5)(i)(B)(2)(iv) and shall be manifested.

B. Post-Clean-up Requirements

1 The site shall be deed recorded in accordance with TCEQ and EPA TSCA PCB regulations.

2. An Inspection Checklist for quarterly cap inspection shall be conducted as part of the post-closure care requirements to ensure the remedial measures remain effective in preventing further PCB contamination. Any required repairs shall be completed within 5 working days of discovery.

3. Post closure Operation and Maintenance activities shall comply with Appendix F in the plan of July 2011. The checklist shall include such items as cap inspection, fencing and security, sediment and erosion control, storm water management system

inspection, and groundwater and surface water monitoring. An annual report shall be submitted to TCEQ and EPA to document post-closure activities.

4. Groundwater and surface water samples shall be collected in accordance with EPA approved methods and procedures every six months for three years beginning six months after clean-up has been completed and a final report has been submitted and approved by EPA Region 6. Groundwater samples shall be collected from groundwater monitoring wells MW-2, WMW-6, WMW-7 and WMW-11. At the end of three years, EPA Region 6 will review the monitoring results and re-assess the post-closure monitoring requirements. If PCBs are detected in the ground water or surface water samples, the Facility shall take immediate action to determine the source or sources of contamination and implement any required remedial action approved by EPA or the TCEQ.

5. Storm water runoff shall be analyzed for PCBs before release from the retention basin using approved EPA sampling and analysis methods appropriate for the samples collected. Sediment shall be removed from the basin as needed. Removed sediment shall be sampled and analyzed for PCBs to determine appropriate disposal options. At least one water sample shall be collected and analyzed for PCBs during storm events where water is released over the weir.

C. Final Report

After the clean-up and decontamination project is completed, the Facility shall submit a final report to EPA Region 6 detailing the final actions taken to remediate the PCB-contaminated concrete surfaces. The report shall contain copies of PCB verification analysis of the contaminated surfaces and a color coded map indicating the final PCB concentrations at the contaminated grid points. The report shall be submitted within 90 days of completion of the project.

III. STANDARD APPROVAL CONDITIONS

A. Severability

The conditions of this authorization are severable, and if any provision of this authorization, or any application of any provision, is held invalid, the remainder of this authorization shall not be affected thereby.

B. Duty to Comply

The Facility shall comply with all Federal, State, and local regulations, approvals, and permits.

C. Personnel Safety

Facility personnel safety requirements and procedures for PCB handling, storage, transport, and disposal shall comply with OSHA requirements.

D. Duty to Mitigate

The Facility shall correct any adverse impact on the environment resulting from noncompliance with this approval.

E. Duty to Provide Information

The Facility shall provide any relevant information which EPA may request to determine whether cause exists for modifying, revoking, reissuing, or terminating this approval, or to determine compliance with this approval. The Facility shall also provide, upon request, copies of records required to be kept pursuant to the TSCA PCB regulations.

F. Inspection and Entry

The Facility shall allow an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

1. enter the Facility during normal business hours,
2. have access to and copy any records that shall be kept under the TSCA PCB regulations,
3. inspect any equipment, practices, or operations required under this approval or the TSCA PCB regulations, or
4. sample or monitor for the purpose of assuring that the Facility is in compliance with the conditions of this approval or the TSCA PCB regulations.

G. Monitoring and Records

The Facility shall comply with all monitoring and record keeping requirements for PCB closure sites in accordance with Section 761.125(c)(5) (please refer to Section 761.61(a)(3), (a)(4), and (a)(5) for the kind of information needed for the records).

H. Effective Date

This approval becomes effective on the date of the approval letter. Clean-up and decontamination required under conditions of this approval shall be completed within 12 months of commencement of PCB remediation activities. The Facility may request an extension of the completion date from the EPA Region 6 if more time is required to complete the project. The Facility shall notify the EPA Region 6 in writing thirty (30) days before commencing remediation activities.

END OF APPROVAL CONDITIONS

FACT SHEET
PCB RISK-BASED REMEDIATION
COMMERCIAL METALS COMPANY
CORPUS CHRISTI, TEXAS

ACTION

Issuance of a PCB proposed approval pursuant to 40 C.F.R. § 761.61(c) for a risk-based cleanup of PCB contaminated soils and concrete at the Commercial Metals Company (CMC) former shredder and recycling facility located in Corpus Christi, Texas.

BACKGROUND

1. The CMC facility is a 17.2 acre property located at 4614 Agnes Street, Corpus Christi, Texas. Prior to CMC's purchase of the site in 1976, General Export Iron and Metal Company operated a secondary metals processing facility since 1951. CMC operations included purchase and transport of both ferrous and non-ferrous metals for recycling.
2. The terrain at CMC is generally flat with ground elevations between 39 to 43 feet above sea level. The property is not located within the 100-year floodplain. Average annual rainfall for the Corpus Christi area is 32 inches per year with most rainfall between April and October. According to reports, the property consists of a layer of fill material underlain by clay. The approximate depth to groundwater ranges from 10 to 15 feet below ground surface.
3. Land use surrounding the CMC property is primarily commercial/industrial. The nearest residential area is located 0.5 miles to the east-northeast.
4. The Texas Natural Resource Conservation Commission (TNRCC) conducted soil sampling at CMC in July 1987, which indicated elevated levels of PCBs and lead. In November 1996, the TNRCC finalized a Voluntary Cleanup Program (VCP) agreement with CMC which included soil sampling and the installation of ground water monitoring wells. Off-site sampling was conducted in January 2004 which indicated elevated risk levels of numerous metals including arsenic, and PCBs. In 2008 additional monitoring wells were installed off-site. No PCBs have been detected in the ground water.
5. The highest reported on-site PCB concentration was 2,670 mg/kg collected in a soil sample near the center of the property by the weighing station. PCBs usually ranged from the 1-40 mg/kg level.
6. The primary exposure pathways identified from the assessment include soil direct contact, soil-to-groundwater ingestion, and groundwater ingestion. The clean-up plan under this risk-based approval has been designed to eliminate these exposure pathways.
7. Contaminated PCB soils and concrete less than 500 ppm PCBs will either be placed in an on-

site clay capped area that will be fenced off, or disposed off-site in an appropriate approved landfill depending on the PCB concentration in the waste.

8. The site will be regraded with storm water management through a storm water retention pond. Post clean-up requirements include ground water monitoring, and clay cap maintenance.

STATE ISSUES

The CMC facility is under a TCEQ VCP, and the risk-based PCB approval process was coordinated with TCEQ. Other onsite contaminants such as lead and cadmium will be remediated under the TCEQ VCP.

PUBLIC NOTICE

A Public Notice (PN) announcing EPA's proposed decision to approve CMC for PCB risk-based cleanup will be published in the Corpus Christi Caller-Times which will open a 45-day comment period during which requests may be made for a Public Hearing.

LOCAL COMMUNITY ISSUES

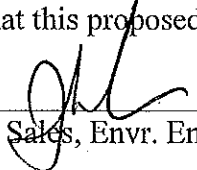
There are no known community issues regarding CMC. There is a local community issue focused on Encycle, a former metal scrapping facility in Corpus Christi which is currently undergoing site remediation under a TCEQ VCP with EPA involvement in PCB galbestos issues.

ENFORCEMENT ISSUES

There are outstanding EPA TSCA enforcement actions regarding this facility.

RECOMMENDATION

I recommend that this proposed approval be granted.



James Sales, Envr. Engr.

5-3-12

Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

APR 13 2011

RECEIVED

APR 13 2011

ENVIRONMENTAL

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Mr. Michael Peters
CMC Americas
Vice President, Environmental Manager
1 Steel Mill Dr.
Seguin, TX 78155-7510

**RE: Site Assessment Strategy Document for Polychlorinated Biphenyls (PCBs)
Contamination at Commercial Metals Company Facility in Corpus Christi, Texas**

Dear Mr. Peters:

We are in receipt of the technical justification for site assessment strategy document entitled, "Geostatistical Analysis" dated December 21, 2010, prepared and submitted by Weston Solutions, Inc. (Weston) on behalf of Commercial Metals Company (CMC), Corpus Christi Recycling Facility (CCRF), located at 4614 Agnes Street, Corpus Christi, Texas. This strategy document supplements your risk-based disposal approval application submitted pursuant to 40 C.F.R. § 761.61(c), and discussions during a conference call on September 20, 2010 between Weston, Texas Commission on Environmental Quality (TCEQ), United States Environmental Protection Agency (EPA) and you.

This strategy document was prepared to address EPA's concerns regarding soil sampling grids used to assess the lateral and vertical extent of PCB contaminated soil at the aforementioned CMC site. This strategy document has been approved as justification to accept the site characterization sampling done thus far both on-site and off-site pursuant to your 40 C.F.R. § 761.61(c) application. Since EPA is accepting your proposal to conduct the site characterization with over-sized sampling grids, any risk-based disposal approval issued per your application would require post verification sampling to be done pursuant to 40 C.F.R. §§ 761.280 – 761.298.

EPA is still awaiting a revised risk-based disposal approval application discussed during the September 20, 2010-conference call reflecting the change in operations at the CMC site. In accordance with 40 C.F.R. § 761.61(c)(2), without the following information, EPA cannot determine whether your application will not pose an unreasonable risk of injury to human health or the environment. Therefore, a revised complete application with the following information must be submitted within 45 calendar days of the date of this letter:

No Shredder Operation: If a shredder will not be used on-site, the following must be included in your revised application:

1. A detailed description of current and future operations or uses at this site;
2. A post-verification sampling plan for both on-site and off-site areas of contamination in accordance with 40 C.F.R. §§ 761.280 – 761.298;
3. Regulatory requirements for sampling and disposal of excavated media to include disposal decisions based on in-situ sampling; disposal site(s) information (name, address, contact information, authority to accept excavated media); and transporter information (name, address, contact information, EPA ID number);
4. Detailed information on any proposed cap(s) or other remedies at the site to include design, monitoring, recordkeeping, maintenance and all necessary long term institutional controls. In order to be protective of health and the environment at a minimum, your application should include a plan containing designs/controls to ensure that no precipitation can reach the underlying soils; controls/maintenance to ensure the entire cap is inspected at least once a calendar quarter, and all discrepancies (e.g., cracks/holes) documented and repairs completed within five working days of discovery;
5. Run-off/run-on controls for precipitation that comes into contact with scrap materials and shredder fluff;
6. A plan for controlling and collecting site run-off and associated sampling plan for PCBs, and any necessary disposal of such in accordance with 40 C.F.R. Part 761; and
7. The application should also include a community outreach plan. In addition, any proposed selected cleanup plan/remedy will be made available to the public during a 45 day public comment period announced by EPA during which requests may be made for a Public Hearing. If there is significant or substantial public comment, a Public Meeting may also be convened to take additional comments.

On-site Shredder Operation: If shredding is to continue at this location, your application must include the aforementioned information and the following additional information:

1. Wind dispersion controls on days and/or nights when shredder is operating in order that wind direction and velocity be recorded; and
2. A Source Control Plan that ensures that no regulated PCB materials are received or shredded at this facility that could be a new source of PCB contamination at this site.

You must also submit separately within 45 calendar days of receipt of this letter a "Temporary Measures Plan" that prevents any further off-site migration, and necessary

mitigation to prevent off-site PCB exposure (see 40 C.F.R. § 761.61). The plan should include, but is not limited to, appropriate engineering controls, fencing and signage.

Please be aware that in accordance with 40 C.F.R. § 761.50(3)(ii)(B) complete compliance with § 761.61 does not create a presumption against an enforcement action for penalties for unauthorized disposal. We look forward to receiving your revised § 761.61(c) application. After review of your revised application, EPA will determine if further information is needed. If you have questions or comments, please contact Mr. Jim Sales, of my staff, at (214) 665-6796.

Sincerely,

A handwritten signature in black ink, appearing to read 'SS', with a long horizontal flourish extending to the right.

Susan Spalding
Associate Director for RCRA
Multimedia Planning and
Permitting Division

cc: Otu Ekpo Otu
Texas Commission on Environmental Quality

Robert Chapin
Weston Solutions, Inc.

PUBLIC NOTICE

ENVIRONMENTAL PROTECTION AGENCY PROPOSAL TO APPROVE RISK-BASED CLEANUP OF POLYCHLORINATED BIPHENYLS (PCBS)

AT

COMMERCIAL METALS COMPANY (CMC), CORPUS CHRISTI, TEXAS

The Environmental Protection Agency (EPA) Region 6, Dallas, Texas office, proposes to approve CMC to conduct risk-based clean-up of soils and concrete contaminated with polychlorinated biphenyls (PCBs) at its property located at 4614 Agnes Street, Corpus Christi, Texas. The site was formerly used as a metal recycling facility. The EPA has authority to issue approvals for risk-based clean-ups of PCBs pursuant to Section 6(e) of the Toxic Substances Control Act (TSCA) in accordance with regulations promulgated under 40 CFR § 761.61(c).

PCBs are a group of chemical compounds previously used extensively in the electrical industry that are generally resistant to biodegradation once they enter the environment. At high concentrations, PCBs have been shown to cause liver and kidney damage in humans, usually through direct exposure or ingestion through contaminated seafood. PCBs are suspected carcinogens (Class B). PCBs are normally found in electrical transformers, capacitors, and contaminated soil resulting from spills.

This notice opens a 45-day comment period during which requests may be made for a Public Hearing. If significant or substantial comments are received during the 45-day comment period, and EPA determines that a Public Hearing should be convened, a 30-day advance notice of the date, time, and place of the Hearing will be published. A Hearing would be held in the evening at a public place in the local area. A copy of the proposed approval may be obtained by writing, calling, or e-mailing EPA. Please write to Mr. James Sales at EPA, Region 6, Facility Assessment Section, 1445 Ross, Ave., Dallas, Texas 75202 (Mail Code 6PD-A). The telephone number is (214) 665-6796. The e-mail address is Sales.James@epa.gov. Comments on this proposal may be sent to this address, phone number, or e-mail.

PCB FACT SHEET PCB REMEDIATION WORK PLAN FOR COMMERCIAL METALS COMPANY CORPUS CHRISTI, TEXAS

ISSUE

There are no policy related issues for this site at the present time. EPA Region 6 PCB staff wants to meet with the representatives of Commercial Metals Company (CMC), the TCEQ's Voluntary Compliance Program (VCP) lead for this site (Mr. Otu Ekpo-Otu), and representatives for CMC's contractor, Weston Solutions, Inc. (Weston), to resolve questions about the history of the site, establish coordination with TCEQ on this project, and answer questions about the current proposal for site remediation submitted by Weston. Up to this time, we have only met with Weston representatives which is not sufficient for the potential issues related to this site.

BACKGROUND

1. In July 2010, Weston submitted a revised Site Assessment Plan and Risk-Based disposal option for CMC, a secondary metals scraper located in the Corpus Christi, Texas area that CMC purchased in 1976. The site is currently under the VCP program to remediate chemicals of concern including lead and PCBs. Since PCBs are under EPA's jurisdiction, the TCEQ referred CMC to EPA for the PCB cleanup. Weston has proposed an alternate PCB sampling strategy as well as onsite risk-based disposal of PCB contaminated soils. The site is about 18.4 acres. The site is currently commercially active.

2. There are several areas identified as contaminated. These are:

- a. Unpaved Shredder Area (about 6.44 acres);
- b. Largely paved 5.7 acre Non-Shredder Area;
- c. Hot Spot Area - one sample showed a PCB concentration of 2,670 ppm;
- d. Maintenance Building Area with PCBs less than 50 ppm;
- e. Existing Concrete Areas where sampling is not yet complete; and
- f. Off-site Areas which are being sampled on 200-ft. grid spacing.

3. Weston has proposed removing onsite soils with greater than 500 ppm PCBs, and off-site soils greater than 1 ppm for off-site disposal.

DISCUSSION

1. EPA Region 6 has several issues with the revised plan regarding past and proposed grid spacing for sampling, the reuse of onsite contaminated soils for road construction activities, the proposal to cap the shredder area and then begin new shredder operations on the cap, the need to ensure that no future PCB contamination will occur when shredding resumes (needs an agreement with EPA to inspect and prohibit the acceptance of pre-1978 cars and any other items that contain PCB liquids), and the plan for inspection and repair of the concrete.
2. EPA Region 6 also wants to question CMC about the disposal of the previous shredder at the site, and whether it was properly sampled, decontaminated and disposed.
3. EPA Region 6 wants the TCEQ present during the meeting in order to establish better coordination, and to resolve issues related to the other chemicals of concern at the site and how they might impact PCB sampling and the final approved remediation plan.

CONCLUSION

Weston told EPA that CMC wanted Weston to handle the remediation project with EPA, but EPA Region 6 has determined that a meeting and inclusion of CMC, TCEQ, and Weston is essential for the efficient resolution of the issues currently known as well as the need for coordination with all parties involved.

FACT SHEET
PCB RISK-BASED REMEDIATION
COMMERCIAL METALS COMPANY
CORPUS CHRISTI, TEXAS

ACTION

Issuance of a PCB approval pursuant to 40 CFR § 761.61(c) for a risk-based cleanup of PCB contaminated soils and concrete at the Commercial Metals Company (CMC) former shredder and recycling facility located in Corpus Christi, Texas.

BACKGROUND

1. The CMC facility is a 17.2 acre property located at 4614 Agnes Street, Corpus Christi, Texas. Prior to CMC's purchase of the site in 1976, General Export Iron and Metal Company operated a secondary metals processing facility since 1951. CMC operations included purchase and transport of both ferrous and non-ferrous metals for recycling.
2. The terrain at CMC is generally flat with ground elevations between 39 to 43 feet above sea level. The property is not located within the 100-year floodplain. Average annual rainfall for the Corpus Christi area is 32 inches per year with most rainfall between April and October. According to reports, the property consists of a layer of fill material underlain by clay. The approximate depth to groundwater ranges from 10 to 15 feet below ground surface.
3. Land use surrounding the CMC property is primarily commercial/industrial. The nearest residential area is located 0.5 miles to the east-northeast.
4. The Texas Natural Resource Conservation Commission (TNRCC) conducted soil sampling at CMC in July 1987, which indicated elevated levels of PCBs and lead. In November 1996, the TNRCC finalized a Voluntary Cleanup Program (VCP) agreement with CMC which included soil sampling and the installation of ground water monitoring wells. Off-site sampling was conducted in January 2004 which indicated elevated risk levels of numerous metals including arsenic, and PCBs. In 2008 additional monitoring wells were installed off-site. No PCBs have been detected in the ground water.
5. The highest reported on-site PCB concentration was 2,670 mg/kg collected in a soil sample near the center of the property by the weighing station. PCBs usually ranged from the 1-40 mg/kg level.
6. The primary exposure pathways identified from the assessment include soil direct contact, soil-to-groundwater ingestion, and groundwater ingestion. The clean-up plan under this risk-based approval has been designed to eliminate these exposure pathways.

7. Contaminated PCB soils and concrete less than 500 ppm PCBs will either be placed in an on-site clay capped area that will be fenced off, or disposed off-site in an appropriate approved landfill depending on the PCB concentration in the waste.

8. The site will be regraded with storm water management through a storm water retention pond. Post clean-up requirements include ground water monitoring, and clay cap maintenance.

STATE ISSUES

The CMC facility is under a TCEQ VCP, and the risk-based PCB approval process was coordinated with TCEQ. Other onsite contaminants such as lead and cadmium will be remediated under the TCEQ VCP.

PUBLIC NOTICE

A Public Notice (PN) announcing EPA's proposed decision to approve CMC for PCB risk-based cleanup was published in the Corpus Christi Caller-Times on June 20, 2012 which opened a 45-day comment period during which requests could be made for a Public Hearing. No comments were received during the comment period which closed on August 4, 2012.

LOCAL COMMUNITY ISSUES

There are no known community issues regarding CMC. There is a local community issue focused on Encycle, a former metal scrapping facility in Corpus Christi which is currently undergoing site remediation under a TCEQ VCP with EPA involvement in PCB galbestos issues.

ENFORCEMENT ISSUES

There are outstanding EPA TSCA enforcement actions regarding this facility.

RECOMMENDATION

I recommend that this approval be granted.

James Sales, Envr. Engr.

Date



May 17, 2013

Mr. James S. Sales (MC-6PD)
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: United States Environmental Protection Agency (EPA) Region 6 Risk-based
Polychlorinated Biphenyl (PCB) Remediation Pursuant to 40 CFR §761.61(c) for the
Commercial Metals Facility Located at Corpus Christi, Texas,
EPA ID No. TXD070482757.

Dear Mr. Sales:

Commercial Metals Company received approval by the Texas Commission on Environmental
Quality (TCEQ) on our Response Action Plan (RAP) March 19, 2013 and will begin remediation
of the Recycling Facility at 4614 Agnes Road on June 17th, 2013.

Please accept this letter as our 30 day written notice to begin remediation as required by
condition H of the Standard Approval Conditions (Section III) of the PCB RISK-BASED
CLEAN-UP PCB CONDITIONS OF APPROVAL (40 CFR § 761.61(c)) FOR Commercial
Metals Company Recycling Facility Corpus Christi, Texas.

If you have any questions, please do not hesitate to email me at randall.walker@cmc.com or to
give me a call at 830.372.8507.

Sincerely,

Randall Walker
Commercial Metals Company

Mr. Otu Ekpo-Out, TCEQ, Environmental Cleanup Section, MC 221

RECEIVED

12 MAY 22 PM 4: 22

RCRA PERMITS PROGRAM



May 17, 2012

Mr. James S. Sales (MC-6PD)
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Regarding United States Environmental Protection Agency (EPA) Proposal to
Approve Commercial Metals Company/CMC Recycling Facility (Corpus Christi)(CMC)
CMC's PCB Risk-Based Cleanup

Dear Mr. Sales:

I have reviewed the proposed approval of Commercial Metals Company/CMC Recycling Facility (Corpus Christi) (CMC) PCB Risk-Based Cleanup and noticed on page one of four of the "Conditions of Approval" item A. 2. the first sentence seems to be missing the phrase "or under the cap" at the end of the sentence.

If you have any questions, please do not hesitate to give me a call at 830.372.8507.

Sincerely,

Randall Walker
CMC

c: Elizabeth A. Hurst



April 11, 2012

Received 4/23/12 JHL

Mr. James S. Sales (MC-6PD)
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Commercial Metals Company/CMC Recycling Facility (Corpus Christi)(CMC)
Response to Comments on the July 2011 Application for 40 CFR 761.61(c) Risk-Based Cleanup

Dear Mr. Sales:

Elizabeth A. Hurst, CMC's legal counsel, provided the following information to you in an e-mail on April 11, 2012 and she asked me to submit this information in hard copy form to you, per your request.

In your review of CMC's Application for a 40 CFR §761(c) Risk-Based Cleanup, dated July 12, 2011, ("the Application") you requested clarification or additional information regarding four issues:

- PCB confirmation (post-excavation) sampling strategy;
- PCB groundwater monitoring;
- Post-remediation, storm-water management requirements; and
- PCB public comment process to be implemented for the approved remedy.

Summaries of these issues and resolutions offered by CMC and EPA are discussed below.

PCB Confirmation Sampling Strategy

In support of the PCB confirmation sampling strategy set forth in Section 4.2.4 of CMC's Application for a risk-based cleanup, CMC proposes that it will perform a geostatistical analysis of the post-excavation verification sampling data to serve as an independent evaluation of the verification sampling and will submit this analysis to EPA for review. If during post verification sampling, it is determined that further characterization is necessary, the geostatistical analysis would be used to locate additional and appropriate sample locations, taking into account any comments or concerns of EPA. **(Attachment A contains the revised language reflecting this change to Section 4.2.4 of the Application. Some of the language regarding Scenario B has been deleted from Section 4.2.4; because CMC acquired the Paxton Street property after**

the submission of the Application. The purchase of the Paxton Street property eliminates Scenario B, as Scenario B assumed the Paxton Street property would be off-site.)

You also requested a breakdown of the difference in costs between sampling under the proposed modified Subpart O post-excavation verification sampling and a Subpart O for this large of a site. The cost differential between the two options for verification sampling is significant. For a Subpart O post-excavation verification sampling, the total costs are estimated to be \$375,000 (\$187,500 for sample collection, labor and supplies; \$150,000 for lab costs, and \$37,000 for report preparation) versus an estimated \$150,000 (\$75,000 for sample collection, labor and supplies; \$60,000 for lab costs, and \$15,000 for report preparation) for the sampling strategy provided for in Section 4.2.4 of the Application.

PCB Groundwater Monitoring

With respect to future groundwater monitoring to be conducted at the Site, CMC understands that groundwater monitoring will be designed to monitor any environmental releases from the consolidation and capped portion of the Site for two years on a quarterly basis. In order to achieve closure of this Site under the Texas Voluntary Clean-up Program, a Plume Management Zone will be required, which will consist of four monitoring wells, as follows: three attenuation monitoring wells (MW-2, WMW-6 and WMW-7), which have already been installed, and one Alternate Point of Exposure well (WMW-11), which will be placed at the site after consultation with both EPA and the TCEQ regarding appropriate placement. **(See, Attachment B for proposed changes to Section 3.1 of the Application.)**

Based on the Site assessment data, groundwater monitoring will be conducted for arsenic. Though CMC will agree to also monitor for PCBs, the company wishes to point out that there is no evidence of PCBs in groundwater, even though much of the ground surface at the Site has remained uncapped and exposed since operations began on this site. Covering PCB soils with clay, as proposed, will protect the soil from vertical migration (leaching) of low-mobility PCBs. Because no PCBs have been detected in groundwater and because the proposed clay cap will address the soil-to-groundwater pathway (and direct contact pathway) at the Site for PCBs, CMC believes that additional groundwater sampling for PCBs is not warranted as part of the post-closure activities, but will agree to do so for the proposed two year period on a quarterly basis.

Post-Remedial Stormwater Management Requirements

Based on EPA's comments, CMC has modified its O & M plan. The proposed changes to Section 4.2.6.3 of the Application is set forth in **Attachment C**, along with an example checklist for stormwater management under the required Texas Pollution Discharge Elimination (TPDES) permit that would supplement Appendix F to the Application.

In addition, CMC provides the following additional information to show how the construction of the retention basin as part of the remediation activities and the monitoring pursuant to the TPDES permit will be sufficient to monitor post-remedial stormwater management:

- Soil and concrete located on-site and off-site that exhibit PCBs ≥ 1 mg/kg will be located beneath a maintained and inspected clay cover. Thus, no exposure pathway will exist for PCBs in stormwater run-off.
- Stormwater run-off from the site will be managed pursuant to the City of Corpus Christ's Drainage Criteria Manual and the TPDES General Permit Program for stormwater management from an industrial facility; and
- Monitoring and maintenance of the stormwater basin and conveyance drainage channels, including the generation of sediments for off-site disposal, will be covered by the general permit requirements of the TPDES program and other relevant regulatory programs.

CMC believes that the TPDES program is more than adequate to ensure that stormwater run-off and impacted sediments collected in the system are properly managed after completion of remediation activities and should satisfy the concerns raised by EPA.

Public Comment Process

CMC acknowledges that EPA will submit the notice to the community of the plan, and if members of the public wish to learn more about the project, CMC will work with EPA on providing the necessary information, so the public understands the project.

Revised Schedule

CMC is also submitting a revised schedule of activities to replace the schedule contained in Section 4.3 of the Application. (See, Attachment D.) The revised schedule is more detailed and reflects an anticipated approval of the application in April or in early May 2012.

If you have any questions, please do not hesitate to give me a call at 830.372.8507. I understand that Elizabeth Hurst will be following up with you regarding the final approval letter. CMC looks forward to working with you on this matter.

Sincerely,



Randall Walker
CMC

Enclosures as stated (Attachments A-D)

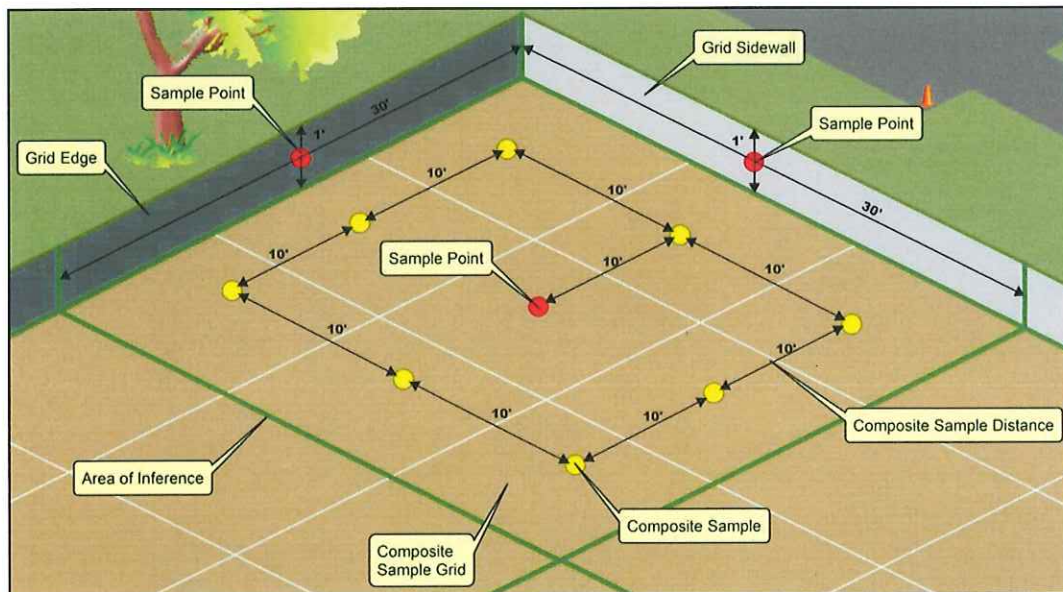
c: Elizabeth A. Hurst
Brad Bredesen (CMC)

ATTACHMENT A

4.2.4 Post Verification Sampling (UPDATE)

(40 CFR 761.280-761.298; Addresses Item #2 in EPA's Letter Dated April 13, 2011)

Post verification samples will be collected using procedures outlined in 40 CFR Part 761, Subpart O with the following modifications. Instead of using the 5 ft sampling grid outlined in 40 CFR 761.283(b), CMC anticipates using a modified sampling grid of 10 ft. This is appropriate based on the size (approximately 18 acres) of the areas that will be sampled, and the spacing being one-fifth to one-tenth that approved for delineation sampling. One soil sample will be collected to a depth of 3 inches bgs from each of the 10-ft grid cells. Samples from nine adjacent grid cells will be composited into one sample for PCB analysis per 40 CFR 761.289(b)(1). A diagram showing the proposed sampling grid is illustrated below.



Grab samples will also be collected from excavation sidewalls using the same 30 ft grid interval. Approximately 209 composite samples (including bottom and sidewall samples) will be submitted for PCB analysis from the Non-Capped Area. Proposed post verification sample grid locations are presented in Figures 12A.

Upon completion of off-site excavation activities, post verification samples will be collected to verify that no concentrations of PCBs greater than 1 mg/kg remain in the soil. Confirmation samples will be collected as described in this Section from both the excavation sidewalls and excavation bottom. An approximate total of 110 composite confirmation samples (including bottom and sidewall samples) will be collected from off-site areas under Scenario A as shown in Figure 12A.

An extensive assessment has been conducted at the site. Based on the assessment results and the conceptual model that explains the distribution of polychlorinated biphenyls (PCBs) in soils at two primary locations and the area that will not be capped CMC believes collection of confirmation soil samples using the modified 10 foot grid system will be sufficient to characterize the remediated areas.

In addition, CMC will conduct geostatistical analysis of the post verification PCB sampling data to serve as an independent evaluation of the post verification sampling PCB soil data for overall characterization of the remediated areas. The previous completed geostatistical analysis indicates the proposed 10 foot sampling grid is robust and adequate to characterize the remediated areas. If during post verification sampling, we find further characterization is necessary we would use the geostatistical analysis along with the EPA's assistance to determine additional sample locations.

This proposed confirmation sampling strategy is based on the distribution of PCBs located on-site and off-site and is consistent with other risk-based remedial programs, such as CERCLA's NPL and RCRA's Corrective Action programs, for PCBs and other hazardous substances and/or hazardous waste constituents with similar distribution patterns and geological settings.

ATTACHMENT B

3.1 GROUNDWATER (UPDATE)

Routes of exposure identified for groundwater include dermal exposure and ingestion. Based on a review of the groundwater sampling results contained in Table 3, no release of PCBs to shallow groundwater has been documented. A water well search conducted on November 29, 2007 (Appendix B) confirmed that no water supply wells are located within a 1-mile radius of the site (EDR, 2007). Water is supplied to this area by the City of Corpus Christi.

Though depth to groundwater is relatively shallow (10 to 15 ft below ground surface [bgs]), suggesting that release to surface water may be possible, no surface water bodies are located within 500 ft of the Site boundary. Also, the absence of detectable concentrations of PCBs in groundwater causes this exposure pathway to be incomplete.

It is worth noting that to achieve closure under the VCP program for all chemicals of concern, a Plume Management Zone (PMZ) will be required for arsenic concentrations detected above the residential protective concentration limits (PCLs) in groundwater. The proposed PMZ network consists of four monitoring wells. Three existing attenuation monitoring wells (MW-2, WMW-6, and WMW-7) and one future Alternate Point of Exposure well (WMW-11) are the proposed PMZ network. Well WMW-11 will be installed during the cleanup phase. The location of WMW-11 will be to the northeast side of the property and will be located with the assistance of the EPA and TCEQ. The groundwater monitoring program will include two years of quarterly sampling events. As part of PMZ implementation, an institutional control will be placed on the property to prevent installation of wells within the PMZ. In addition to a lack of groundwater receptors, the implementation of a PMZ will further minimize the availability of this pathway to surface receptors.

No complete pathway is present for groundwater.

ATTACHMENT C

4.2.6.3 Post-Response Action Care Operations and Maintenance Plan (Updated Version)

As previously noted, the project will be subject to Deed Notice under the VCP and TRRP; an example deed notice is included as Appendix E. Post-response action care will include quarterly inspections of the cap area. Operation and Maintenance (O&M) activities will be performed as dictated by the O&M plan or by site conditions. Examples of the O&M inspection checklist and quarterly stormwater visual examination checklist ~~is~~ are included as Appendix F. O&M activities and inspections will include the following items in accordance with standard post-closure care requirements:

- Fencing and Security: The cap will be secured to prevent unauthorized entry and appropriate warning signs will be posted. Any damage to the security fence noted during the quarterly inspection will be repaired promptly, and the cap will be monitored for unauthorized use.
- Post Closure Care Supervision: Post-closure care will be under the supervision of the person responsible for environmental management of the site.
- Post Closure Cap System Integrity: The cap system will be inspected quarterly to assess its integrity. Special attention shall be paid to evidence of settlement/ponding, erosion of exposed clay cap material, evidence of cracking, and evidence of burrowing animals. Prompt remedial action will be taken if any of these items are discovered during an inspection. Repairs will be completed within 5 working days of discovery.
- Final Cover: The cap system will be inspected quarterly to verify that all affected soil remains covered. Documentation of discrepancies will be kept on-site. Any area noted as having erosion or settling will be repaired, and newly filled areas will be reseeded, refertilized, and watered to promote growth of the vegetation.
- Vegetative Cover: A regular mowing/landscape maintenance program will be instituted as part of the O&M plan to maintain the aesthetics and integrity of the vegetative cover layer. Areas found without proper vegetative cover will be reseeded and refertilized. Trees and other species that may have invasive root systems and are not part of the planned vegetative cover species will be promptly located, identified, and removed during routine O&M activities.
- Sediment and Erosion Control: All drainage structures and slopes will be maintained according to the final engineering design.
- Stormwater Management System: Stormwater from the site will be managed pursuant to the City of Corpus Christ's Drainage Criteria Manual and the Texas Pollution Discharge Elimination System (TPDES) General Permit Program. CMC's Agnes Road property has

an existing stormwater management plan and TPDES permit for an industrial facility; permit TXR05N434. The requirements of the TPDES permit in combination with the O & M plan include the following:

- Quarterly visual examination of stormwater samples and site inspections.
(Example Inspection Checklists are set forth in Appendix F).
 - Semi-annual, and annual stormwater sample collections and analysis.
 - Annual samples will be analyzed for arsenic, barium, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium, silver, and zinc.
 - Semi-annual samples will be analyzed for copper, aluminum, iron, lead, zinc, TSS, COD, and Total PCB's.
 - There is no exposure pathway for PCB's; however, CMC will test for Total PCB's as proof this pathway does not exist.
 - Routine maintenance and monitoring (Example Inspection Checklist is set forth in Appendix F):
 - Stormwater basin integrity.
 - Conveyance drainage channels.
 - Sediment buildup in basin
 - The watershed area will be free of PCB's and planted with native grass so very little sediment will be collected in the basin. CMC will maintain the basin and remove sediment as necessary. In addition, CMC will test all sediment removed from the stormwater basin for total PCB's and profile the waste material for proper disposal.
- The stormwater management system will be inspected quarterly for signs of obstructed drainage and deteriorating or damaged channel or basin (See, Appendix F for Example Inspection Checklist). ~~The stormwater management system will be inspected quarterly for signs of obstructed drainage and deteriorating or damaged channel or basin.~~
- Groundwater and Surface Water Monitoring: All groundwater and surface water monitoring will be performed in accordance with the O&M plan and the TRRP requirements for closure under the VCP.
- Site Equipment: Adequate equipment will be available to ensure that the requirements of the O&M plan are executed correctly and efficiently.
- Post Closure Use of Site: CMC will ensure that any post-closure use of the Site will not disturb the integrity of the cover or any component of the stormwater management or monitoring systems in accordance with the deed restrictions that will be enacted. Annual post response action care reports will be submitted to the TCEQ as required by the VCP. A copy of the report will be sent to EPA yearly.

QUARTERLY VISUAL EXAMINATION OF STORMWATER
[EXAMPLE CHECKLIST]

Parameter	Condition					
	CLEAR	BROWN	DARK BROWN	BLACK	OTHER	DESCRIBE:
COLOR	CLEAR					
ODOR	NONE	STAGNANT	MILD HYDROCARBON	STRONG HYDROCARBON	OTHER	DESCRIBE:
CLARITY	CLEAR	SLIGHTLY CLOUDY	CLOUDY	VERY CLOUDY	OTHER	DESCRIBE:
FLOATING SOLIDS	NONE	MINOR AMOUNT	MODERATE AMOUNT	HEAVY AMOUNT	OTHER	DESCRIBE:
SETTLED SOLIDS	NONE	MINOR AMOUNT	MODERATE AMOUNT	HEAVY AMOUNT	OTHER	DESCRIBE:
SUSPENDED SOLIDS	NONE	MINOR AMOUNT	MODERATE AMOUNT	HEAVY AMOUNT	OTHER	DESCRIBE:
FOAM	NONE	LIGHT	MODERATE	HEAVY	OTHER	DESCRIBE:
OIL SHEEN	NONE	LIGHT	MODERATE	HEAVY	OTHER	DESCRIBE:

MEASURED RAINFALL (INCHES)	LENGTH OF RAIN EVENT

NO STORMWATER DISCHARGE DURING QUARTER

INSPECTOR: _____ DATE: _____

NOTE: Examination must be made during first 30 minutes of a rain event totaling at least .1 inches following a dry period of at least 72 hours.

EXAMPLE
SITE INSPECTION FORM

Site Name: _____ Permit No.: _____

Weather: _____ Inspection Date: _____

Reviewed by: _____ Inspector (Print): _____

Site Map Attached: Yes _____ No _____ Signature: _____

Location-Inspection Criteria	Yes	No	N/A	Comments/Repairs *All repairs need to be dated and completed within five working days of discovery
GENERAL SITE				
1. Security Fencing/Gate				
a. Evidence of deterioration				
b. Signs of unauthorized entry				
c. Warning signs not properly posted				
2. Evidence of unauthorized dumping				
CAP				
1. Evidence of settlement/ponding				
2. Evidence of erosion or exposed wastes				
3. Evidence of cracking				
4. Evidence of burrowing animals				
7. Vegetation adequate				
GROUNDWATER MONITORING WELLS				
1. Deteriorating, damaged, or missing concrete pads or guard posts				
2. Damaged or deteriorating well pipe				
3. Deteriorating, damaged, or missing protective casings or locks				
4. Deteriorating, damaged, or missing well caps				
5. Deteriorating well labels.				
SURFACE WATER SYSTEMS				
1. Deterioration/Erosion of drainage channels				
3. Evidence of obstructed drainage				
4. Deterioration of monitoring point labels				
5. Deterioration of retention pond				
6. Sediment pond cleaning needed				

N/A Not applicable to site location

ATTACHMENT D

Activity	Anticipated Start Date
Approval of Application for Risk Based Cleanup by EPA, (Including time for review and consideration of any changes that may need considered during the approval process.)	April 2012 – early May 2012
Prepare Response Action Plan (RAP) TCEQ VCP	June 2012 - August 2012
Public Comment Period and Responses/Changes (if necessary)	September 2012 - November 2012
Final Engineering Design and Bid Specifications	December 2012 – February 2013
Bidding Process and Bid Selection	March 2013 – April 2013
Relocation	June 2013 – July 2013
Concrete Demolition Activities	August 2013 – September 2013
On-Site and Off-Site Soil Excavation and Confirmation Sampling	October 2013 - November 2013
Backfilling of Excavated Areas and Construction of Clay Cap	December 2013 - January 2014
Final Grades, Stormwater Retention Improvements, and Final Fencing	February 2014 – March 2014
Preparation of Response Action Completion Report (RACR)	April 2014 – August 2014
Groundwater Monitoring and Reporting	June 2012 – July 2014